

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

Crim. No. 04-30046-MAP

ALBERT INNARELLI, ET AL,  
DEFENDANTS

**DEFENDANT, MICHAEL BERGDOLL'S MOTION TO CONTINUE**

Now comes the defendant, Michael Bergdoll, by and through counsel, and moves the Court for a order on continuing the date presently established for sentencing and to amend the present scheduling order in all respects.

As his basis therefore counsel asserts the following:

Counsel for defendant, Michael Bergdoll, has become medically disabled and will be shortly filing a Motion to Withdraw.

A reasonable period of time is necessary for successor counsel to file an appearance and undertake a review of the file in order to prepare for sentencing.

Wherefore, the defendant moves the scheduling order presently in existence be modified as to his case.

Dated: August 24, 2006

The Defendant  
Michael Bergdoll  
By his attorney

/s/ Steven W. Leary, Esq.  
95 State Street  
Springfield, MA 01103  
Tel. 413-737-1489  
Fax. 413-733-0238  
BBO#290520